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IR 85-07  
IR 85-05  
Ref # 10CFR2.201

William G. Council  
Executive Vice President

February 20, 1987

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)  
DOCKET NOS. 50-445 AND 50-446  
INSPECTION REPORT NOS.: 50-445/85-07 and 50-446/85-05  
SUPPLEMENTAL REQUEST FOR INFORMATION TO NRC  
NOTICE OF VIOLATION (NOV) ITEMS 1, 2.a and 2.b

REF: 1) TU Electric Letter TXX-4727 from W. G. Council to  
E. H. Johnson dated April 2, 1986  
2) NRC letter from E. H. Johnson to W. G. Council  
dated December 30, 1986  
3) TU Electric Letter TXX-6211 from W. G. Council to NRC  
dated January 28, 1987

Gentlemen:

We reviewed your letter (Reference 2) requesting additional information on the subject inspection report, and responded to the NOV's in our letter TXX-6211 (Reference 3). In our response to NOV 445/8507-03 (Item 2.b), we stated that TU Electric Quality Assurance was in the process of obtaining related information from the vendor and reviewing site documentation, and we anticipated submitting our response no later than February 16, 1987. We requested and received an extension in providing our response to NOV 445/8507-03 (Item 2.b) until February 20, 1987, during a telephone conversation with Mr. I. Barnes on February 17, 1987. We hereby respond to Item 2.b in the attachment to this letter.

Very truly yours,

*W. G. Council*  
W. G. Council

RSB:lw  
Attachment

c - Mr. E. H. Johnson, Region IV  
Mr. D. L. Kelley, RI - Region IV  
Mr. H. S. Phillips, RI - Region IV

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NOTICE OF VIOLATION  
ITEM 2.b (445/8507-03)

SUPPLEMENTAL REQUEST FOR INFORMATION

With respect to the corrective steps taken, please describe what formal actions were taken (e.g., specification revision) to justify the change in output voltage from 10 +/- 2v to 12 +/- 2v on the revised Westinghouse Quality Release. Your response also fails to provide any actions taken to assure that other equipment received from this vendor, irrespective of time frame, did not exhibit similar documentation deficiencies.

SUPPLEMENTAL RESPONSE TO ITEM 2.b

Further evaluation of the apparent violation revealed a need to revise our original response. Accordingly, the following revised response is submitted.

1. Reason for the Violation

The root cause of the out-of-tolerance condition was a relocation of the Westinghouse subtier supplier's test facility in 1978. A change in the local power level from 240v nominal at the old test facility to 277v nominal at the new location was not initially detected. This change affected the test result output. The supplier representative failed to detect the apparent out-of-tolerance condition noted on the test report prior to release of the equipment from the subtier suppliers shop (Halmar Electronic Corporation) and subsequent shipment to CPSES.

The out-of-tolerance conditions noted on the test report was not detected by CPSES QC receiving inspection personnel because Westinghouse supplied non-ASME equipment is receipt accepted based on the Westinghouse Quality Release (QR) being complete and general conformance verification to purchase order requirements.

2. Corrective Steps Taken and Results Achieved

Westinghouse Engineering performed a review of test data for all Electric Hydrogen Recombiner (EHR) Silicon Controlled Rectifier (SCR) panels tested during the period May 13, 1975 to March 8, 1981, bracketing the period during which the 240 to 277 volt plant power transition effect on test results may not have been recognized. The result of the documentation review for the 209 SCRs revealed an additional out-of-tolerance condition of the same nature, which has been documented on a Westinghouse Deviation Notice (DN). The Westinghouse Engineering review has established that there was no adverse effect on the performance or function of the equipment as a result of the deviation.

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ITEM 2.b (445/8507-03)

SUPPLEMENTAL RESPONSE TO ITEM 2.b - CONT'D

2. Corrective Steps Taken and Results Achieved - Cont'd

The output voltage specification was changed and documented in Halmar test procedure TP-001 and approved by Westinghouse Engineering per Westinghouse DN No. 26961 to compensate for the change in the test power supply.

3. Corrective Steps Which Will Be Taken to Avoid Further Violations

Westinghouse's revaluation revealed only two panels out of 209 manufactured in the given time period to exhibit this out-of-tolerance condition. Therefore, this is considered a limited incident of personnel error by Westinghouse's subvendor (Halmar) specific to these panels. These errors were not identified in the Westinghouse surveillance review of the test data due to the sampling nature of this review. Since the time period of this issue, but not as a result of this apparent violation, Westinghouse subtier supplier generated documentation has been subjected to increased frequency and depth of review by Westinghouse prior to authorization for shipment.

4. Date When Full Compliance Will Be Achieved

CPSES is presently in compliance.